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8 *IT&S FAR WEST DIVISION – HCA IT&S FIELD*  
*OPERATIONS, INC.*

9  
10 UNITED STATES DISTRICT COURT  
11 FOR THE DISTRICT OF NEVADA

12 ALEXIS SANCHEZ,

13 Plaintiff,

14 vs.

15 HOSPITAL CORPORATION OF  
AMERICA – FAR WEST DIVISION (HCA  
16 HEALTHCARE), a corporation; KIRK  
JOHNSON, an individual; MONICA  
17 STRAUSS, an individual; CHRISTINE  
PROUTY, an individual; and DOES 1  
through 10, inclusive,

18 Defendants.  
19

CASE NO.: 2:25-cv-00618-ART-NJK

20 **STIPULATION TO RESCHEDULE**  
**DATE FOR EARLY NEUTRAL**  
**EVALUATION**

(First Request)

21 IT IS HEREBY STIPULATED between Plaintiff Alexis Sanchez (“Plaintiff”) and Defendant  
22 IT&S Far West Division – HCA IT&S Field Operations, Inc.<sup>1</sup> (“Defendant”), by and through their  
23 respective attorneys of record, hereby submit this proposed Stipulation and Order to Reschedule the  
Early Neutral Evaluation currently scheduled for August 8, 2025 to August 4, 2025.

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27 <sup>1</sup> Defendant IT&S Far West Division – HCA IT&S Field Operations, Inc. was incorrectly identified  
28 in the Complaint as “Hospital Corporation of America – Far West Division.”

**STIPULATED FACTS**

The parties respectfully request that the Early Neutral Evaluation (“ENE”) be advanced for the following reasons:

1. The required parties and their counsel are not all available on August 8, 2025, the date selected by the Court.

2. Counsel for the parties conferred regarding their respective availability in August and were unable to identify a mutually agreeable date after the scheduled ENE until September.

3. The parties believe it is in the best interest of the litigation to conduct the ENE earlier in the discovery in order to best explore the possibility of an early resolution. Further, as the parties are requesting that the hearing be advanced, it is not for purposes of delay.

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**CONCLUSION**

For the foregoing reasons, Plaintiff Alexis Sanchez (“Plaintiff”) and Defendant IT&S Far West Division – HCA IT&S Field Operations, Inc. (“Defendant”), by and through their respective attorneys of record, hereby submit this proposed Stipulation and Order to Reschedule the Early Neutral Evaluation currently scheduled for August 8, 2025 at 10:00 a.m. to a time convenient for this Court on August 4, 2025.

DATED this 15<sup>th</sup> day of May, 2025.

SABEL LAW APC

/s/ Steven D. Sabel

Steven D. Sabel  
Nevada Bar No. 15810  
304 S. Jones Blvd., Suite 1309  
Las Vegas, NV 89107

*Attorneys for Plaintiff,  
Alexis Sanchez*

DATED this 15<sup>th</sup> day of May, 2025.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,  
P.C.

/s/ Kathryn C. Newman

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*Attorneys for Defendant,  
IT&S Far West Division – HCA IT&S Field  
Operations, Inc.*

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

May 16, 2025

DATED